

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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David Thames on behalf of himself
and classes of those similarly
situated, and Fabiola Adonis, Akash
Ahmed, Augstin Alvarez, James
Anderson, Kenneth Bird, Saleha
Biswas, Annabelle Boose, Chris
Bradshaw, Santrese Brower-Haynes,
Paul Brown, Jeffrey Coleman,
Tammie Cromartie, Noel Reyes
Contreras, Antionette Davis, Patricia
Deline, Jasmin Diaz, Hakan Duzel,
Alfonso Esquivel, Vilma Flamenco,
Taga Fahim, Salvatore Grande, Akes
Handy, Kim Harley, Roger Hillaire,
Luke Hopkins, Suzette Johnson,
David Latimer, Doris Laya Calle,
Lisa Muse, Roudy Noel, Nathan
Ouderkirk, Denise Pokrentowski, Iris
Rivera, Awilda Rosario, Joeann
Starling, Judith Sutherland, Sherron
Thomas, Leon Tucker, Marcus
Vaughn, and Denise Williams
collectively,

Plaintiffs,

vs.

KFC Corporation,

Defendant.

ECF CASE

Case No. 1:07-cv-06836-WHP

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KFC CORPORATION'S RULE 26(A)(1) INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant KFC Corporation ("KFC"), hereby submits the following initial disclosures in connection with the above-referenced action. These representations are made in good faith and upon current information and belief. Further, each representation is made subject to all objections as to competence, materiality, relevance, or other objection as to its admissibility that may apply in the

event that and such disclosure, or any information contained in it, is sought to be used in court. KFC expressly reserves all such objections as well as the right to supplement these disclosures as required by Rule 26(e)(1).

(A) Individuals Likely to Have Discoverable Information

Plaintiffs David Thames on behalf of himself and classes of those similarly situated, and Fabiola Adonis, Akash Ahmed, Augstin Alvarez, James Anderson, Kenneth Bird, Saleha Biswas, Annabelle Boose, Chris Bradshaw, Santrese Brower-Haynes, Paul Brown, Jeffrey Coleman, Tammie Cromartie, Noel Reyes Contreras, Antionette Davis, Patricia Deline, Jasmin Diaz, Hakan Duzel, Alfonso Esquivel, Vilma Flamenco, Taga Fahim, Salvatore Grande, Akes Handy, Kim Harley, Roger Hillaire, Luke Hopkins, Suzette Johnson, David Latimer, Doris Laya Calle, Lisa Muse, Roudy Noel, Nathan Ouderkirk, Denise Pokrentowski, Iris Rivera, Awilda Rosario, Joeann Starling, Judith Sutherland, Sherron Thomas, Leon Tucker, Marcus Vaughn, and Denise Williams collectively, the addresses and phone numbers of whom are in the possession of Plaintiffs' counsel, are likely to have discoverable information. In addition, the supervisors and co-workers of the named Plaintiffs may also have such information.

(B) Description and Location of Relevant Documents

KFC has in its possession, custody or control personnel files and personnel profiles of the named Plaintiffs to this case, job descriptions, training manuals, the KFC Standards Library, KFC Management Planners, Operations Bulletins, scheduled time data, and payroll data.

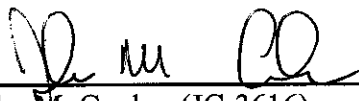
(C) Damages

N/A.

(D) Insurance

KFC does not believe that there is any insurance agreement under which any person carrying on an insurance business may be liable to (i) satisfy part or all of any judgment that may be entered in this case or (ii) reimburse KFC for any payments made to satisfy any judgment.

Dated: November 21, 2007.



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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Defendant KFC Corporation's Rule 26(a)(1) Disclosures upon the parties referenced below by causing a copy of the same to be deposited in the United States mail, first-class postage prepaid, addressed to:

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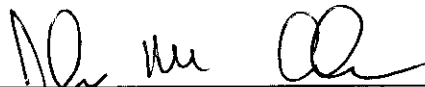
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This Wednesday, November 21, 2007.



Counsel for Defendant